

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*
CYNTHIA E. BETANCOURT COLON	* CASE NO. 15-05006 ESL
Debtor(s)	* CHAPTER 13

BANCO POPULAR DE PUERTO RICO,	* INDEX
Movant	*
CYNTHIA E. BETANCOURT COLON,	*
JOSE R. CARRION MORALES, CHAPTER 13	*
TRUSTEE	*
Respondent (s)	*

DEBTOR'S RESPONSE TO *MOTION FOR RELIEF FROM STAY*
DOCKET NO. 36

TO THE HONORABLE COURT:

NOW COMES, CYNTHIA ENID BETANCOURT COLON, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On November 9, 2015, Banco Popular de Puerto Rico ("BPPR") filed a motion requesting that stay be lifted in the present bankruptcy case, docket no. 36, basically alleging that the debtor is in arrears in the post-petition direct mortgage loan payments to said creditor in the sum of \$2,152.40, including late charges, plus \$575.00 for legal fees and costs for the present Index.

2. The debtor respectfully submits that she is in the process of obtaining the funds to cure the aforementioned post-petition arrears owed to BPPR. For the last two (2) months, the debtor's salary and earnings were reduced due to a reduction in debtor's work hours.

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3. The above stated reduction in debtor's salary forced the debtor to look for a second job in order to compensate for the loss of monthly income. The debtor respectfully states that she will commence in a part-time job (this is an additional job or second job) that will allow her to cure the post-petition arrears owed to BPPR.

4. That the debtor respectfully requests additional time to cure the post-petition arrears owed to BPPR. The debtor understands that she may cure the post-petition arrears owed to BPPR within thirty (30) days from the date of the preliminary hearing scheduled for December 03, 2015, in the above captioned Index. This extension of time to expire on January 04, 2016.

WHEREFORE, the debtor respectfully requests from this Honorable Court to grant the present response and grant debtor's request for an extension of time to cure the post-petition arrears owed to BPPR as stated by BPPR in its motion requesting relief from the automatic stay, docket entry #36, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; Sergio A. Ramirez de Arellano, Esq., Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the debtor/respondent Cynthis Enid Betancourt Colon, Caminito Edif 9 Apt 907 Gurabo PR 00778.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, 30th day of November, 2015.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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